

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BARBARA ZAROWITZ, Derivatively On
Behalf of PFIZER, INC.,

Plaintiff,

vs.

HENRY A. MCKINNELL, WILLIAM C.
STEERE, JR., JEAN-PAUL VALLÈS,
MICHAEL S. BROWN, STANLEY O.
IKENBERRY, FRANKLIN D. RAINES, M.
ANTHONY BURNS, ROBERT N. BURT, W.
DON CORNELL, WILLIAM H. GRAY III,
CONSTANCE J. HORNER, WILLIAM R.
HOWELL, GEORGE A. LORCH, DANA G.
MEAD and RUTH J. SIMMONS

Defendants,

- and -

PFIZER, INC. a Delaware corporation,

Nominal Defendant.

MARVIN FREEMAN, Derivatively On Behalf
of PFIZER, INC.,

Plaintiff,

vs.

HENRY A. MCKINNELL, MICHAEL S.
BROWN, M. ANTHONY BURNS, ROBERT
N. BURT, W. DON CORNWELL, WILLIAM
H. GRAY, III, CONSTANCE HORNER,
WILLIAM R. HOWELL, STANLEY O.
IKENBERRY, GEORGE A. LORCH, DANA

Civil Action No. 04 CV 10075 (RCC)

**PLAINTIFF CLARK'S RESPONSE TO
CONSOLIDATION AND LEADERSHIP**

Civil Action No. 04 CV 10085 (RWS)

G. MEAD, FRANKLIN D. RAINES, RUTH J.
SIMMONS, WILLIAM C. STEERE, JR.,
JEAN-PAUL VALLÈS, DAVID SHEDLARZ,
KAREN KATEN and JEFFREY B. KINDLER

Defendants,

- and -

PFIZER, INC. a Delaware corporation,

Nominal Defendant.

DORIS STAEHR, Derivatively On Behalf of
PFIZER, INC.,

Plaintiff,

vs.

HENRY A. MCKINNELL, KAREN L.
KATEN, DAVID L. SHEDLARZ, PETER B.
CORR, CONSTANTINE L. CLEMENTE,
WILLIAM C. STEERE, JR., JOHN F.
NIBLACK, JEFFREY P. KINDLER, ROBERT
N. BURT, WILLIAM H. GRAY III,
CONSTANCE J. HORNER, WILLIAM R.
HOWELL, GEORGE A. LÖRCH, ALEX J.
MANDL, MICHAEL I. SOVERN, MICHAEL
S. BROWN, M. ANTHONY BURNS, W. DON
CORNWELL, STANLEY O. IKENBERRY,
DANA G. MEAD, FRANKLIN D. RAINES,
RUTH J. SIMMONS, JEAN-PAUL VALLÈS,
HARRY P. KAMEN, GEORGE B. HARVEY,
THOMAS G. LABRECQUE and DOES 1-25,
inclusive,

Defendants,

- and -

PFIZER, INC. a Delaware corporation,

Nominal Defendant.

GAIL FINK, Derivatively On Behalf of
PFIZER, INC.,

Plaintiff,

vs.

HENRY A. MCKINNELL, KAREN L.
KATEN, DAVID L. SHEDLARZ, PETER B.
CORR, CONSTANTINE L. CLEMENTE,

Civil Action No. 04 CV 10096 (MGC)

Civil Action No. 04 CV 10098 (RWS)

WILLIAM C. STEERE, JR., JOHN F. NIBLACK, JEFFREY P. KINDLER, ROBERT N. BURT, WILLIAM H. GRAY III, CONSTANCE J. HORNER, WILLIAM R. HOWELL, GEORGE A. LORCH, ALEX J. MANDL, MICHAEL I. SOVERN, MICHAEL S. BROWN, M. ANTHONY BURNS, W. DON CORNWELL, STANLEY O. IKENBERRY, DANA G. MEAD, FRANKLIN D. RAINES, RUTH J. SIMMONS, JEAN-PAUL VALLÈS, HARRY P. KAMEN, GEORGE B. HARVEY, THOMAS G. LABRECQUE and DOES 1-25, inclusive,

Defendants,

- and -

PFIZER, INC. a Delaware corporation,

Nominal Defendant.

JAMES BAKER, Derivatively On Behalf of PFIZER, INC.,

Plaintiff,

vs.

HENRY A. MCKINNELL, KAREN L. KATEN, DAVID L. SHEDLARZ, PETER B. CORR, CONSTANTINE L. CLEMENTE, WILLIAM C. STEERE, JR., JOHN F. NIBLACK, JEFFREY P. KINDLER, ROBERT N. BURT, WILLIAM H. GRAY III, CONSTANCE J. HORNER, WILLIAM R. HOWELL, GEORGE A. LORCH, ALEX J. MANDL, MICHAEL I. SOVERN, MICHAEL S. BROWN, M. ANTHONY BURNS, W. DON CORNWELL, STANLEY O. IKENBERRY, DANA G. MEAD, FRANKLIN D. RAINES, RUTH J. SIMMONS, JEAN-PAUL VALLÈS, HARRY P. KAMEN, GEORGE B. HARVEY, THOMAS G. LABRECQUE and DOES 1-25, inclusive,

Defendants,

- and -

PFIZER, INC. a Delaware corporation,

Nominal Defendant.

Civil Action No. 04 CV 10118 (SAS)

SANFORD FLINKER and SYLVIA G.
FLINKER, Derivatively On Behalf of PFIZER,
INC.,

Plaintiff,

vs.

HENRY A. MCKINNELL, MICHAEL S.
BROWN, M. ANTHONY BURNS, ROBERT
N. BURT, W. DON CORNWELL, WILLIAM
H. GRAY, III, CONSTANCE HORNER,
WILLIAM R. HOWELL, STANLEY O.
IKENBERRY, GEORGE A. LORCH, DANA
G. MEAD, FRANKLIN D. RAINES, RUTH J.
SIMMONS, WILLIAM C. STEERE, JR.,
JEAN-PAUL VALLÈS, DAVID SHEDLARZ,
KAREN KATEN and JEFFREY B. KINDLER

Defendants,

- and -

PFIZER, INC. a Delaware corporation,

Nominal Defendant.

x **Civil Action No. 04 CV 10141**

ARKANSAS CARPENTERS PENSION
FUND, Derivatively On Behalf of PFIZER,
INC.,

Plaintiff,

vs.

HENRY A. MCKINNELL, KAREN L.
KATEN, DAVID L. SHEDLARZ, PETER B.
CORR, CONSTANTINE L. CLEMENTE,
WILLIAM C. STEERE, JR., JOHN F.
NIBLACK, JEFFREY P. KINDLER, ROBERT
N. BURT, WILLIAM H. GRAY III,
CONSTANCE J. HORNER, WILLIAM R.
HOWELL, GEORGE A. LORCH, ALEX J.
MANDL, MICHAEL I. SOVERN, MICHAEL
S. BROWN, M. ANTHONY BURNS, W. DON
CORNWELL, STANLEY O. IKENBERRY,
DANA G. MEAD, FRANKLIN D. RAINES,
RUTH J. SIMMONS, JEAN-PAUL VALLÈS,
HARRY P. KAMEN, GEORGE B. HARVEY,
THOMAS G. LABRECQUE and DOES 1-25,
inclusive,

Defendants,

x **Civil Action No. 04 CV 10257**

- and -

PFIZER, INC. a Delaware corporation,

Nominal Defendant.

MARILYN CLARK, Derivatively On Behalf of
PFIZER, INC.,

Plaintiff,

vs.

HENRY A. MCKINNELL, KAREN L.
KATEN, DAVID L. SHEDLARZ, PETER B.
CORR, CONSTANTINE L. CLEMENTE,
WILLIAM C. STEERE, JR., JOHN F.
NIBLACK, JEFFREY P. KINDLER, ROBERT
N. BURT, WILLIAM H. GRAY III,
CONSTANCE J. HORNER, WILLIAM R.
HOWELL, GEORGE A. LORCH, ALEX J.
MANDL, MICHAEL I. SOVERN, MICHAEL
S. BROWN, M. ANTHONY BURNS, W. DON
CORNWELL, STANLEY O. IKENBERRY,
DANA G. MEAD, FRANKLIN D. RAINES,
RUTH J. SIMMONS, JEAN-PAUL VALLÈS,
HARRY P. KAMEN, GEORGE B. HARVEY,
THOMAS G. LABRECQUE and DOES 1-25,
inclusive,

Defendants,

- and -

PFIZER, INC. a Delaware corporation,

Nominal Defendant.

Civil Action No. 05 CV 00051 (NRB)

X

I. RESPONSE

Plaintiff Clark filed the eighth of eight shareholder derivative actions brought on behalf of Pfizer, Inc. ("Pfizer") against certain of its officers and directors for their mismanagement of the company. Two groups of plaintiffs have moved for the consolidation of these actions and appointment of their suggested leadership structure. In the interest of brevity, plaintiff Clark offers the following as her position on these issues: First, plaintiff Clark supports consolidation of all of the actions; Second, plaintiff Clark supports the leadership structure proffered by plaintiffs Zorowitz, Staehr, Fink and Arkansas Carpenters Pension Fund.

DATED: February __, 2005

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